



Lawrence Livermore National Laboratory

Environmental Protection Department

April 13, 2005

Ms. Luz Castillo, Senior Hazardous Substances Scientist
Statewide Compliance Division
Department of Toxic Substances Control
700 Heinz Avenue
Berkeley, CA 94710-2737



**SUBJECT: Completion of Corrective Actions Associated with
2004 CEI Class 1 Violation, Item #3
Livermore Main Site (EPA ID# CA2890012584)
Lawrence Livermore National Laboratory (LLNL)**

Dear Ms. Castillo:

This letter is being submitted in order to notify you of Lawrence Livermore National Laboratory's (LLNL's) completion of outstanding corrective actions and to provide you with requested documentation associated with the 2004 Compliance Evaluation Inspection (CEI) Class 1 Violation, Item #3, "Certifying Prohibited Waste for Land Disposal Without Meeting Treatment Standards." At the time LLNL submitted the January 14, 2005 response letter, all requested corrective actions had been completed with the exception of training on waste characterization, interpretation, and validation processes, and retrieval of documentation associated with Envirocare's treatment and disposition of the waste assigned to Waste Disposal Requisition (WDR) number W209971 (the waste that was incorrectly certified and shipped to Envirocare of Utah for land disposal).

As of March 23, 2005 LLNL's Environmental Protection Department completed formal training for the individuals in the Radioactive and Hazardous Waste Management (RHW) Division who review analytical data and perform data validation as part of the waste characterization process. The training included implementation of a Lessons Learned session, and an assessment and line-by-line review of the characterization process described in procedure WIC 140 entitled, "Data Quality Objectives Process", provided to you in LLNL's January 14, 2005 response letter. An outline of the training process is included in Attachment 1.

As described in LLNL's previous response letter dated January 14, 2005, RHW has introduced a new peer review step into their waste characterization process to ensure accurate transmittal of hard copy analytical data to electronic spreadsheets. The peer review step is also used for all other functions considered pertinent in the waste characterization process. Please note that instructions on the use of the Peer Review

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Form (formally referred to as the Data/Document Verification Form, WGS form #0116), included in Attachment 2, were included as part of the training given to RHWM personnel involved in the data validation step of the waste characterization process.

Attachment 3 includes a copy of Envirocare's Certificate of Disposal for waste WDR W209971, disposed into the land on January 31, 2005. RHWM personnel have contacted Envirocare to ensure that the waste was treated to meet LDR treatment standards prior to disposal into the land.

Please contact me at (925) 422-3985 if you have any questions regarding these responses.

Sincerely,

(Original signed by
Ellen Raber)

Department Head

ER/VS:cp

Attachments:

Attachment 1:	Outline of RHWM Training Process
Attachment 2:	Peer Review Form (Data/Documentation Verification Form, WGS Form #0116)
Attachment 3:	Envirocare's Certificate of Disposal for WDR W209971